

REMARKS

Applicant has amended the claims in order to overcome the Examiner's objections under 35 U.S.C. § 112. Applicant submits that the amended claims comport with all of the requirements of § 112 and requests that the Examiner now withdraw this objection.

Applicant respectfully requests reconsideration of the prior art rejections set forth by the Examiner under 35 U.S.C. §§ 102 and 103. Applicant submits that the references of record, whether considered alone or in combination, fail to either teach or suggest Applicant's presently claimed invention.

In particular, Applicant notes that the present invention is directed to a system for collecting and organizing data, including a database management system for organizing video images and data associated with a transaction into a database. See, for example, claim 1. As alternately described in claim 12, Applicant's claimed invention is directed to a method of creating a transaction database comprising steps of storing an image of a transaction and data correlated to the transaction into a database such that a query into the database using a portion of the data acts as a key for retrieving the image correlated to the data. See, for example, claim 12. Applicant submits that the prior art of record fails to provide any teaching or suggestion whatsoever regarding the presently claimed invention as described above.

In particular, Applicant notes that the primary reference upon which the Examiner relies in rejecting the claims under 35 U.S.C. §§ 102 and 103 suffers from the shortcomings of the prior art noted in Applicant's description of the background of the invention. Specifically, the Katz reference, U.S. Patent No. 5,920,338, is directed to a surveillance system which asynchronously records video signals corresponding to behavioral events

and transaction data. In order to achieve playback of this information, the system requires that the transaction which is stored separate and apart from the video information be matched with the video information being replayed from a video tape. See, for example, the abstract of the disclosure in the Katz reference.

Indeed, a thorough review of the Katz reference provides no teaching or suggestion regarding Applicant's storage of both transactional data and video images in a database as claimed. In contrast with the claimed invention, Katz described a system where two separate storage units are used for respectively storing video images related to a transaction and separate transaction data. As a result of utilization of these two separate and distinct storage media, it is absolutely necessary that each media include synchronization information or signals stored with the respective video and transactional data. This is clearly detailed in the Katz reference in the Summary of the Invention, in column 2, lines 60-67. Here the disclosure of Katz recognizes that "the first recording means must also store the synchronizing signal." (emphasis added) The digital signals are stored separately on the video tape so as not to degrade either the digital signals or the video signals.

In column 3, Katz further states in the Summary of the Invention, that a second recording means stores the digital signals along with all other event or transaction data. The second recording means also stores the synchronizing signals. See Katz, column 3, lines 1-5. A playback means then retrieves the information saved by the two storage devices. See Katz, column 3, lines 4-5. In Katz, a control means synchronizes digital data from the second recording means with composite video signal by comparing the synchronizing by signals stored by both recording means. See specifically, Summary of

the invention at claims 14-16. It is apparent from the Katz disclosure that each storage unit must be separately searched in order to retrieve both video and transaction information. This is substantially different from the present invention where a database is simply searched for the records corresponding to a single identifier. This can readily be accomplished by any known database access technique including linked lists, etc.

The device disclosed in the Katz reference is substantially different than that disclosed in the present invention. Specifically, Katz requires an entirely separate structure which provides correlation between the two separately stored signals. In contrast with the Katz reference, the present invention uses a single database for storing and retrieving both video and corresponding data relating to the video information. This is significantly better than the system of Katz in that there is no need to spend time searching for two separate data stores. Rather, a single transaction identifier is sufficient to more quickly pull the data from this single database with a single inquiry.

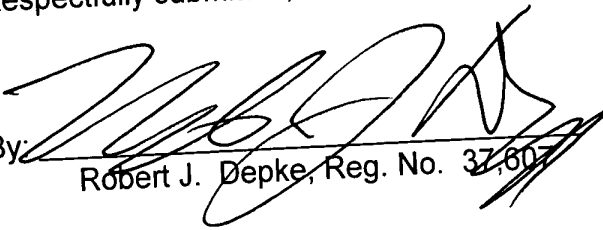
In light of the foregoing, Applicant respectfully submits that the references of record fail to either teach or suggest the presently claimed invention. Accordingly, Applicant requests that the Examiner withdraw the prior rejections and now allow all claims in the application.

The Commissioner is hereby authorized to charge any additional fees required for submission of this document to Deposit Account No. 13-0019.

Respectfully submitted,

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